

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LARIMEN WALLACE

Plaintiff,

V.

CIVIL ACTION NO. 1:20-CV-01191-RP

**TRAVIS COUNTY HEALTHCARE
DISTRICT D/B/A CENTRAL HEALTH**

Defendant.

**DEFENDANT'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendant Travis County Healthcare District D/B/A Central Health (“Defendant” or “Central Health”) respectfully files this second unopposed motion requesting an extension of time in which to file its responsive pleadings and would respectfully show the Court as follows:

1. The Plaintiff filed this action in state court on October 29, 2020 and sent the petition to Defendant's counsel on November 14, 2020. Defendant subsequently waived service of citation on November 17, 2020. Defendant removed the case to federal court on December 4, 2020 before filing an Answer. As a result, the initial deadline for Defendant to file a responsive pleading was December 11, 2020, pursuant to Fed. R. Civ. P. 81(c)(2).

2. On December 11, 2020, Defendant filed its first Motion for an extension until January 11, 2020 to file a responsive pleading to allow time for the parties to conclude their

settlement negotiations. D.E. 3. The Court granted the Defendant's Motion on December 14, 2020.

3. As of the date of this filing, the parties have not yet concluded their settlement negotiations. Accordingly, to allow the parties adequate time to conclude their negotiations, Defendant moves for a 14-day extension of time for the filing of its responsive pleadings.

4. With a 14-day extension, Defendant's responsive pleadings would be due on January 25, 2021.

5. This motion is filed not for purposes of delay, but so that justice may be done. Plaintiff will not be prejudiced by the granting of this extension of time.

6. Therefore, Defendant requests an extension of its deadline to file its responsive pleadings to January 25, 2021.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that an extension of time for the filing of its responsive pleadings be granted.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ Stephanie S. Rojo
Stephanie S. Rojo
State Bar No. 24041815
Kimberly L. Kauffman
State Bar No. 24089255

701 Brazos, Suite 1500
Austin, TX 78701
512-708-8200 (telephone)
512-708-8777 (fax)
Email: srojo@thompsoncoe.com
Email: kkauffman@thompsoncoe.com

**ATTORNEYS FOR DEFENDANT
TRAVIS COUNTY HEALTHCARE DISTRICT
D/B/A CENTRAL HEALTH**

CERTIFICATE OF CONFERENCE

The undersigned counsel has conferred with Plaintiff's counsel regarding this motion and Plaintiff is unopposed.

/s/ *Stephanie S. Rojo*
Stephanie S. Rojo

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2021, a true and correct copy of the foregoing document was served in accordance with the Federal Rules of Civil Procedure upon all known counsel and parties of record by electronic service using the Court's CM/ECF system.

Colin Walsh
WILEY WALSH P.C.
1011 San Jacinto Blvd.; Suite 401
Austin, Texas 78701
512-271-5527 (telephone)
512-201-1263 (fax)
colin@wileywalsh.com

ATTORNEY FOR PLAINTIFF
LARIMEN WALLACE

/s/ *Stephanie S. Rojo*
Stephanie S. Rojo